

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.

Plaintiff,

**GMA'S First Request for Documents  
to LISA KLINE, INC., JONATHAN  
SINGER and LEWIS TIERNEY**

Civil Action No.: 07CV3219 (LTS) (DCF)

- against -

EMINENT, INC., SAKS FIFTH AVENUE, INC.,  
INTERMIX, INC., WINK NYC, INC.,  
LISA KLINE, INC., GIRLSHOP, INC.,  
SHOWROOM SEVEN STUDIOS, INC.,  
JONATHAN SINGER, LEWIS TIERNEY and  
JONATHAN SOLNICKI,

Defendants.

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SIRS:

Plaintiff by and through its attorneys, The Bostany Law Firm, hereby requests defendants, LISA KLINE, INC., JONATHAN SINGER and LEWIS TIERNEY, to produce copies of the documents set forth below at The Bostany Law Firm, 40 Wall Street, New York, New York 10005 pursuant to Fed.R.Civ.P. 34:

**Definition:**


"CHARLOTTE products": merchandise with the word CHARLOTTE or CHARLOTTE SOLNICKI depicted on the product, product packaging, product marketing, promotion or advertisements.

"You and Your": the defendant answering these interrogatories

- (a) All purchase orders, sales orders and invoices pertaining to CHARLOTTE products.
- (b) Any and all documents which would indicate the approximate number of CHARLOTTE products purchased.
- (c) Any and all documents which would indicate the approximate number of CHARLOTTE products sold and your revenue.
- (d) Any and all emails, memos, documents, records, or writings of any kind reflecting or relating to the manufacture, marketing, sale, purchase, promoting, distributing or other disposition of CHARLOTTE products.
- (e) All communications with Jonathan Solnicki, or any employees or agents of Charlotte Solnicki or Showroom Seven.
- (f) All invoices received from your supplier including any and all purchase orders submitted by you to your supplier for purchase of CHARLOTTE products.
- (g) Originals or color copies of all of your brochures, websites, catalogs or advertisements depicting CHARLOTTE products or making use of the CHARLOTTE mark.
- (h) All documents which reveal how CHARLOTTE and/or CHARLOTTE SOLNICKI mark was selected and/or adopted
- (i) All documents which show your date of first use and first use in commerce of CHARLOTTE products.

- (j) All documents which support your affirmative defenses.
- (k) All documents which support your counterclaims.
- (l) All spreadsheets, accounts, summaries, memos or other documents which show sales, revenue and profit for CHARLOTTE products for each month.
- (m) Sample specimens of each of the CHARLOTTE products.
- (n) Copies of documents licensing or allowing you to do business under another name.

Dated: New York, New York  
November 14, 2007

By:   
ANDREW T. SWEENEY (AS-0724)  
THE BOSTANY LAW FIRM  
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